

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
Plaintiff, )  
 )  
v. ) Civil Action No.  
 )  
REAL PROPERTY REGISTERED IN THE )  
CADASTRAL MUNICIPALITY OF KRNICA, )  
LAND RECORD STREET NUMBER 1764, )  
CADASTRAL PARCEL NUMBER 1420/2 – )  
ARABLE LAND WITH AN AREA OF 851 M<sup>2</sup>, )  
IN THE LAND RECORDS OF THE MUNICIPAL )  
COURT IN PULA, CROATIA; )  
 )  
REAL PROPERTY REGISTERED IN THE )  
CADASTRAL MUNICIPALITY OF OPRIĆ, )  
LAND RECORD STREET NUMBER 2543, )  
CADASTRAL PARCEL NUMBER 1210 – )  
WITH A TOTAL AREA OF 2,310 M<sup>2</sup>, IN THE )  
LAND RECORDS OF THE MUNICIPAL )  
COURT IN OPATIJA, CROATIA; )  
 )  
REAL PROPERTY REGISTERED IN THE )  
CADASTRAL MUNICIPALITY OF OPRIĆ, )  
LAND RECORD STREET NUMBER 1660, )  
CADASTRAL PARCEL NUMBER 1215/14 – )  
WITH A TOTAL AREA OF 922 M<sup>2</sup>, IN THE )  
LAND RECORDS OF THE MUNICIPAL )  
COURT IN OPATIJA, CROATIA; )  
 )  
REAL PROPERTY REGISTERED IN THE )  
CADASTRAL MUNICIPALITY OF OPRIĆ, )  
LAND RECORD STREET NUMBER 1661, )  
CADASTRAL PLOT NUMBER 1215/15 – )  
WITH A TOTAL AREA OF 1,642 M<sup>2</sup>, AND IN )  
THE LAND RECORDS OF THE MUNICIPAL )  
COURT IN OPATIJA, CROATIA; and )  
 )  
ONE 52-FOOT FAIRLINE TARGA MOTORING )  
YACHT, BEARING HULL NUMBER )  
GB-FLN10444A404, )  
Defendants. )

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(A) alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1335.

Venue is appropriate pursuant to 28 U.S.C. § 1335.

2. The defendant properties consist of:

- a. real property registered in the cadastral municipality of Krnica, land record street number 1764, cadastral parcel number 1420/2 – arable land with an area of 851 m<sup>2</sup>, in the land records of the Municipal Court in Pula, Croatia;
- b. real property registered in the cadastral municipality of Oprić, land record street number 2543, cadastral parcel number 1210 – with a total area of 2,310 m<sup>2</sup>, in the land records of the Municipal Court in Opatija, Croatia;
- c. real property registered in the cadastral municipality of Oprić, land record street number 1660, cadastral parcel number 1215/14 – with a total area of 922 m<sup>2</sup>, in the land records of the Municipal Court in Opatija, Croatia;
- d. real property registered in the cadastral municipality of Oprić, land record street number 1661, cadastral plot number 1215/15 – with a total area of 1,642 m<sup>2</sup>, and in the land records of the Municipal Court in Opatija, Croatia

(collectively, the “Croatian Real Properties”), and

- e. one 52-foot Fairline Targa motoring yacht, bearing hull number GB-FLN10444A404 (the “Yacht”).

3. As detailed in the Affidavit of Shaun T. Santos, Task Force Agent of the United States Drug Enforcement Administration, attached as Exhibit A and incorporated herein by reference, the Croatian Real Properties and the Yacht are subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) because they are moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in

exchange for a controlled substance or listed chemical, or proceeds traceable to such an exchange, or moneys, negotiable instruments, and securities used or intended to be used to facilitate violations of 21 U.S.C. §§ 846 and/or 963; and/or pursuant to 18 U.S.C.

§ 981(a)(1)(A) as they constitute properties involved in a money laundering transaction in violation of 18 U.S.C. §§ 1956 and/or 1957, or properties traceable to such property.

WHEREFORE, the United States of America prays:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshals Service commanding them to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Croatian Real Properties and the Yacht;
3. That thereafter, the Croatian Real Properties and the Yacht be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney,

By: /s/ Veronica M. Lei  
VERONICA M. LEI  
Assistant United States Attorney  
United States Attorney's Office  
1 Courthouse Way, Suite 9200  
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Dated: March 26, 2013

**VERIFICATION**

I, Shaun T. Santos, Task Force Agent, United States Drug Enforcement Administration, state that I have read the foregoing Verified Complaint for Forfeiture *in Rem* and the Affidavit, attached as Exhibit A, and that the contents thereof are true to the best of my knowledge, information and belief.



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Shaun T. Santos, Task Force Agent  
United States Drug Enforcement Administration

Dated: March 26, 2013

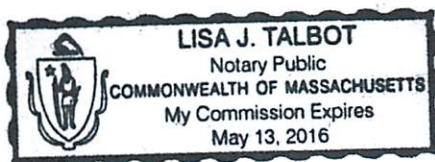
**COMMONWEALTH OF MASSACHUSETTS**

Suffolk, ss.

Boston

Then personally appeared before me the above-named Shaun T. Santos, Task Force Agent of the United States Drug Enforcement Administration, who acknowledged the foregoing to be true to the best of his knowledge, information and belief, on behalf of the United States of America.

Subscribed to and sworn to before me this 26th day of March, 2013.



Lisa J. Talbot  
Notary Public  
My Commission Expires: May 13, 2016



**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing documents were filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing



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VERONICA M. LEI  
Assistant United States Attorney

Dated: March 26, 2013